

Environmental Health Coalition

COALICION de SALUD AMBIENTAL

401 Mile of Cars Way, Suite 310 ♦ National City, CA 91950 ♦ (619) 474-0220 ♦ FAX: (619) 474-1210
ehc@environmentalhealth.org ♦ www.environmentalhealth.org

MEMORANDUM

March 8, 2010

To: Lara Gates, Bill Anderson, Mary Wright, City of San Diego
Department of City Planning and Community Investment

From: Georgette Gómez, EHC Director, Toxic Free Neighborhoods Campaign

Re: Barrio Logan Community Plan Update Propose Elements and Policies
EHC's response to Goals and Policies

As requested, Environmental Health Coalition (EHC) is submitting comments to the different proposed Barrio Logan Community Plan Elements released on January 30, 2010.

Overall the current proposed Goals and Policies for each of the Community Elements are somewhat reflective of what has been shared during the stakeholders meetings. The area that currently does not reflect what has been shared during this update process is the importance of addressing incompatible land uses to improve health and the environment in the Barrio Logan community. Therefore, EHC asked that the Goals and Policies to each of the Elements recognize the importance of improving the health and the environment in the Barrio Logan community by addressing incompatible land uses. EHC would like to submit the following amendments to the Goals and Policies of the different community Elements, which addresses incompatible land uses throughout Barrio Logan.

Thank you for the opportunity to submit our comments. We look forward to further develop the Goals and Policies for Barrio Logan Community Plan. If you have any questions in the meantime, please contact Georgette Gómez at (619) 474-0220 ext. 104.

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Conservation Element

Goals

- Promote and encourage a variety of ~~recycling~~**efficiency** practices and opportunities for the residential and business community
- Implement successful community garden programs.

Input - 5 (Agree)

8.1 Policies - Climate Change and Sustainability

- Require new development and redevelopment to meet half of their energy demand by incorporating energy efficiency measures over the minimum of Title 24, clean renewable generation and demand response.
- Encourage a community farmers market hub

Input - 5 (Agree)

8.2 - Open Space and Landform Preservation

- Design community plan to meet General Plan requirements for park/resident ratio
- Protect and enhance existing open space and parks by prohibiting conversion or development of these areas and ensuring no net loss of open acreage.

Input - 5 (Agree)

8.2 - Water Resource Management

Input - 5 (Agree)

8.2 - Urban Runoff Management

Input - 5 (Agree)

8.2 - Air Quality

- Enforce state laws prohibiting truck idling
- Work with the Port of San Diego to enforce truck upgrade laws for Port-serving trucks
- Adopt an amortization ordinance requiring relocation of air pollution sources that are rezoned near homes and schools and other sensitive uses
- Encourage industrial uses to modernize and upgrade their operations to significantly reduce energy use, increase efficiency and reduce emissions.

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- Reduce the impact of direct, indirect and cumulative impacts of stationary and non-stationary sources of pollution.

Input - 5 (Agree)

8.2 - Sustainable Energy

- Provide information to **Barrio Logan residents (renters/owners)** on City programs and other incentives to achieve ~~more~~ energy efficient buildings and renewable energy production

Input - 4

8.2 - Urban Forestry

- ~~Whenever feasible~~ **Require** that new development retain significant and mature trees.

Input - 4

8.2 - Scenic Resources and Public Access

- Improve public access to the Bay.

Input - 5

Mobility Element

Goals

- Preserve diagonal parking
- Safe and efficient street design that minimizes environmental and neighborhood impacts
- Well maintained streets

Input - 5 (Agree)

Policies - Safety and Accessibility

- Design and fully implement Safe Route to School routes.
- Make sidewalks and street crossings accessible to pedestrians of all abilities.
- Design and operate sidewalks, streets, and intersections to emphasize pedestrian safety and comfort through a variety of street design and traffic management solutions.
- Implement crime prevention through environmental design measures to reduce the threat and incidence of crime in the pedestrian environment.

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- Ensure that there are adequate law enforcement, code enforcement, and litter and graffiti control to maintain safe and attractive neighborhoods.
- Provide adequate levels of lighting for pedestrian safety and comfort.
- Minimize obstructions and barriers that inhibit pedestrian circulation.

Policies - Connectivity

- Work toward achieving a complete, functional and interconnected pedestrian network.
- Provide and maintain trash and recycling receptacles to the public.
- Routinely accommodate pedestrian facilities and amenities into private and public plans and projects.

Policies - Walkability

- Improve walkability through the pedestrian-oriented design of public and private projects in areas where higher levels of pedestrian activity are present.
- Enhance alleys as secure pathways to provide additional pedestrian connections.
- Implement traffic calming measures to improve walkability.
- Continue to collaborate with regional agencies, school districts, community organizations and activist, public health professionals, developers, law and code enforcement officials, and others, to better realize the mobility, environmental, social, and health benefits of walkable communities.
- Improve air quality to enhance walkability

Policies - Transportation

- Work closely with regional agencies and others to increase transit ridership and mode share through increased transit service accessibility, frequency, connectivity, and availability.

Public Facilities, Services, and Safety Element

Goals

Input - 5 (Agree)

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Policies

6.1 - Police and Fire Rescue Services

- ~~Establish a satellite police storefront location in conjunction with the fire station to better serve Barrio Logan.~~
- Continue conversion of "yellow" (low-pressure sodium) streetlights to "white" (white low-energy consumption) street lighting, **as well as solar powered streetlights.**

Input - 3

6.1 - Water, Storm Water/Infrastructure and Sewer

- Require new buildings to utilize designs to capture and control runoff

Input - 5

6.1 - Waste Management

Input - 5

6.1 - Parks, Schools, Library

- Develop an open space plan to enhance public open space.
- Improve public access to the Bay
- Ensure that sensitive uses such as schools, childcare centers, parks and playgrounds, housing and community gathering places are protected from adverse impacts of emissions.

Input - 5

6.1. - Public Utility Lines, Wireless Communications Facilities, Street Lights

Input - 5

6.1 - Community Services

- Encourage new development and redevelopment projects to provide community amenities and uses that serve community needs.

Input - 5

6.1 - Healthcare and Social Service Facilities

- Encourage the provision of sufficient and easily accessible and **prevention** health care facilities to meet needs of all sectors of the growing Barrio Logan population.

Input - 5

6.1 - Geologic and Seismic Hazards

Input - 5

6.1. - tsunami and Sea Level Rise

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- Incorporate sea level rise predicted as a result of climate change into new development plans

Input - 5

6.1 - Hazardous Materials

- Do not allow facilities with reportable quantities of hazardous materials and wastes within 1000 feet of sensitive uses.

Input - 5

6.1 - Emergency Preparedness

- Proper language notification

Input - 4

6.1 - Brownfields

- Work with property owners and regional agencies to reduce soil and water contamination from industrial operations and other activities that use, produce or dispose of hazardous or toxic substances.
- Require appropriate mitigation measures and clean-up of sites that are known to contain toxic materials as a condition of allowing reuses.
- Seek state and federal funds to implement clean-up
- Work with responsible parties to ensure compliance with state and federal requirements for clean-up as a condition for redevelopment on these contaminated sites.
- Promote the clean-up and reuse of contaminated sites.

Input - 5

Historic Preservation Element

Goals

- Preserve Barrio Logan culture and spirit

Input - 4

Policies

10.1

- Build on and enhance the character and identity of the community.

Input 5

10. 2

Input 5

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Urban Design Element

Goals

- Promote urban design that facilitates optimal public health.
- Promote high-quality and sustainable development

Policies

4.1. - Architecture and Building Design

- Prevent conflicts between land uses to protect human and environmental health and safety and preserve community character.

Input - 5

4.1 - Safety and Security

Input - 5

4.1 - Sustainable Neighborhood Environment

- Recycled and/or sustainable materials are encouraged in appropriate locations.
- ~~Lawns~~ **Green space** in private courtyards should be planted to encourage minimal water use and encouraging permeability.

Input - 5

4.1 - Views

- **Improve and** protect view corridors toward San Diego Bay and Downtown San Diego

Input - 5

4.1 - Healthy Environment

- Prevent land use conflicts from residential, public assembly, and other sensitive receptor land uses from industrial land and prime industrial land uses
- Prevent construction of new residential units within 500 feet of freeways
- Prevent conflicts between land uses to protect human and environmental health and safety and preserve community character.
- Encourage development of neighborhood nodes to promote convenient access to local services and amenities.

Input - 4

4.1 - Boston/Newton Green Street

Input - 5

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4.1 - Retail/Commercial Buildings

Input - 5

4.2 - Focus Area 1

Input - 5

4.3 - Focus Area 2

- Parcel consolidation is ~~discouraged~~ **not allowed** to maintain the historic building pattern of smaller buildings on small lots.

Input - 4

4.4 - Focus Area 3 (NOT ACCEPTABLE)

- Provide attractive, adequate visual screening at the edges of properties ~~used for industrial uses.~~
- Uses allowed are those which do not pose a health risk to sensitive receptor land uses adjacent to or in the near proximity
- Incentives measures that reduce health risks, noise, and traffic.
- Do not allow facilities with reportable quantities of hazardous materials and wastes within this focus area.
- Prevent conflicts between land uses to protect human and environmental health and safety and preserve community character.

Input -2

4.5 - Focus Area 4

Pedestrian-friendly commercial streets

- Diagonal on-street parking should be utilized ~~wherever possible~~ to slow traffic and provide needed parking for commercial and residential uses.

Input - 4

4.6 - Focus area 5 (MOVE Boundary to south of Chollas Creek and west of Harbor Drive)

Input -

4.1 - Public Art

- Coordinate closely with the City Commission for Arts and Culture, the Port of San Diego's Public Art programs, and representatives of the Barrio Logan arts community on public art programs, including projects funded by the City public art program in lieu fees, to promote diverse installations that help to create and reinforce the uniqueness of Barrio

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Logan as well as reflect and celebrate the ~~array of regional~~ **Mexican American** cultural and environmental influences.

- ~~Develop~~ **Incorporate** future public art as part of new development projects.

Input - 4

Economic Prosperity Element

Goals

- ~~Minimize~~ **Prevent incompatible** conflict between commercial, industrial, residential, and institutional land uses through the implementation of complementary land uses and appropriate buffers.
- Protect sufficient long-term capacity for base sector industries by expanding Barrio Logan's Prime Industrial lands south of ~~32nd~~ **Chollas Creek** and west of Harbor Drive.
- ~~Foster economic growth of major maritime industries and local businesses that cater to the maritime industries while promoting environmentally sustainable business operations.~~
- Strengthen and stabilize the community's present socioeconomic makeup as a residential community and an industrial **supporting** center for water-oriented industry.
- Provide opportunities for job creation that benefit low to middle income workers ~~and in~~ the local community.
- Encourage Community Serving business.
- Expand and diversify the employment base to provide quality jobs for Barrio Logan Residents
- Encourage environmentally responsible businesses that make positive contributions to the Barrio Logan community.

Input - 3

Policies

5.1 - Industrial

- Provide additional land area for prime industrial lands expansion south of ~~32nd~~ **Chollas Creek** and west of Harbor Drive to provide new jobs, new job categories, and training possibilities in the community.

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- Encourage ~~Heavy~~ an exclusive **Maritime** Industrial land uses **south of Chollas Creek and** west of Harbor Drive to include base-sector uses such a maritime-oriented ~~manufacturing park~~.
- ~~Heavy~~ **Maritime** industrial uses should ~~work to~~ **significantly** reduce or ~~mitigate~~ negative impacts on surrounding areas, such as noise, air quality, or other environmental impacts.
- Encourage industries and trade-related business that provide ~~middle income~~ **living wage** employment opportunities to locate in lands designated as Prime Industrial.
- Ensure that industrial uses are consolidated south of Chollas Creek and east of Harbor Drive.

Input - 3

5.1 - ~~International Business and Trade Zone~~ **Community Commercial Zone**

- Establish separation between industrial and residential land uses, safeguarding the environmental health of the regional neighborhoods and residents.
- Allowable uses are those uses that do not pose a health risk to sensitive receptor land uses adjacent to or in the near proximity.
- Incentivize measures that reduce health risks, noise, and traffic.
-

Input - 2

5.2 - Retail

- Locate smaller-scale **healthy option** convenience shopping opportunities throughout Barrio Logan to promote greater pedestrian activity.
- Encourage and provide economic incentives for healthy food retail.
- Promote and support locally owned and cooperative enterprises and businesses to maximize economic and community benefits for Barrio Logan residents.

Input - 4

5.3 - Office

- Encourage and foster the development of office uses ~~catering to as identified in the transition~~ **Community Commercial zone** ~~maritime-serving industries.~~

Input - 3

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5.4 - Parking

- Preserve and enhance diagonal parking throughout Barrio Logan
 - Development of parking ~~facilities~~ **structure** that serve multiple uses, to enable efficient use of space over the course of the day;

Input - 4

5.5 - Business Finance

- Encourage the adoption of business improvement districts, maintenance assessment districts, and landscape and lighting districts throughout Barrio Logan to enhance the quality of life and provide ~~tools~~ resources to promote businesses.
- Develop revitalization plan for Barrio Logan with collaboration of community leaders and organizations.

Input - 4

Land Use Element

Goals

- Promote maritime-oriented supporting development that enhances and reflects the character of Barrio Logan and supports major Port and Naval uses, **which do not pose health risk problems.**
- Encourage stable base sector employment uses and supportive commercial ~~and industrial services~~ for Downtown San Diego and waterfront businesses.
- Promote the production of affordable housing in Barrio Logan **for the low to very-low income level residents.**
- **Promote healthy and safe compatible land uses throughout Barrio Logan.**

Input - 4

Policies

2.1

- Include ~~market rate and~~ **maximum number of** affordable housing units **for the low to very-low income** ~~at a mixture of~~ affordability levels.

Input - 4

2.2 - Housing Types

-

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Input - 4

2.2. - Housing: Affordability and New Development

- ~~Promote~~ **Maximize** the production of very-low to low income affordable housing in all residential and multi-use neighborhood designations.
- Create affordable home ownership opportunities for moderate income buyers.
 - Encourage the development of moderately priced, market-rate (unsubsidized) housing affordable to middle income households earning up to ~~150%~~ **80%** of area median income.
 - Promote **and enhance** homebuyer assistance programs.
 - Promote Community Land Trust opportunities and partnerships.
- Utilize land-use, regulatory and financial ~~tools~~ **resources** to facilitate the development of housing affordable to ~~all~~ **Barrio Logan** income levels, including:

Input- 4

2.2. - Existing Development

- Retrofit current housing to be healthy and energy efficient units.

Input - 4

2.2 - Commercial

- Provide incentives that encourage relocation of incompatible ~~commercial~~ **industrial**, vehicular repair and maintenance, chrome plating and **welding** uses.
- Enhance and retain maritime-oriented commercial uses that are compatible with surrounding land uses, **which do not pose health risk problems**.
- Encourage environmentally responsible commercial that make positive contributions to the Barrio Logan community.

Input - 4

2.2 - Industrial

- ~~Protect and~~ Promote development of ~~maritime and~~ **supplier** uses.
- Coordinate with Harbor Police and San Diego Police to develop programs and enforcement of truck route violations.

Input - 4

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2.2 - Institutional

Input - 5

2.3 Input - 5

Recreation Element

Goal

Input - 5

Policies

7.1

- Equivalency credit???
- Lighting

Input - 4

7.2

- **Fully implement Chollas Creek Enhancement Plan**

Input - 4

7.3

Input - 5

7.4

Input - 5

Noise Element

Goals

Input - 5

Policies

9.1

- Enforce Noise Code Enforcement Operational Hours
- Enforce noise levels in residential areas to be below 50 dB almost all the time.

Input - 4

9.2

- Work with the California Department of Transportation to mitigate traffic impacts by placing berms or noise walls along Interstate 5 to reduce noise levels.

Input - 4

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9.3

- Enforce state laws prohibiting truck idling

Input - 4